

04/02/02

Before the Federal Communications FCC
Washington, D.C.

In the Matter of: Schools and Libraries Universal Service

Docket No. 02-6 Support Mechanism

Comments on Notice of Proposed Rule Making Submitted by Lebanon School District:

Post Discount Process

We recommend the existing law and FCC procedure be changed so that the SLD would provide funds **directly to schools and libraries**, thereby removing all the complications revolving around the post discount process that have occurred between the SLD, vendors, and applicants. A direct payment to the schools and libraries would be a clean transaction and would remove all the late payment, or worse yet, the non-payment issues that have had to be dealt with. Our experience from **Year 1** involved a vendor bankruptcy that lead to non-payment by the vendor in the amount of \$130,737.71 and the SLD keeping \$85,526.42 "On Watch". Fortunately, through the Good Samaritan Request we will be receiving the \$85,526.42, however it's now **Year 5**. Unfortunately, even though we provided SLD with a heads-up on the bankruptcy and asked them to put \$122,473.94("On Watch"), a combination of two BEAR's, the SLD only put \$85,526.42 "On Watch". This lengthy process has been tedious and time consuming and could have been avoided by directly providing the funds to schools and libraries. All the other questions regarding post discount process would be mute if only the procedure could be changed to direct payments to schools and libraries.

Eligible Services

We suggest to the FCC that the E-rate eligible services would be easier to understand if there was a centralized database of all approved products and services (as opposed to just an eligible services list). Because applicants would only select from pre-approved products and services, this presumably would decrease the number of instances in which applicants seek funding for ineligible services. We also suggest that such a process would considerably simplify the application review process. An approved list could be issued 2-3 months before the 471window opens.

Voice Mail

We recommend that the FCC reconsider its initial determination regarding the eligibility of voice mail because of the increasing need for, and prevalence of, voices mail as a way of communicating With school and library staff for educational purposes. Such eligibility also may streamline the application review process, by reducing administrative effort and costs associated with determining what portion of a school or library's telecommunications costs are related to voice mail, and ensuring that the school or library does not receive discounts for those costs.

30% Processing Benchmark

We suggest the burden of applying for eligible and ineligible services rests with the applicant. The description must match the SLD eligible verbiage. The idea of providing applicants with a pre-approved service/product list would eliminate this problem.

Respectfully submitted,

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